

To: Richardson, Marvin G [REDACTED] Allen, Joseph J. [REDACTED]  
 Cc: Gilbert, Curtis W [REDACTED]  
 From: Griffith, Earl L.  
 Sent: Tue 10/3/2017 9:05:13 PM  
 Subject: Bump stock history  
Research-Bump Fire Stocks-OCT 2017.pdf

Gentlemen,

This is all we could find in our data bases.

There are a total of eleven devices.

- (1) we did not evaluate because a physical sample was not included.
- (9) were classified as NOT machineguns.
- (1) was classified as Machinegun.

Below is an inventory of what is included in the attachment in order by date (oldest first).

**Bump Fire / Slide Fire Device Classification - FATD - OCT 2017**

IQ #Date		Letter Addressed to:		Classification	Phc s		
		Name-who submitted device	Name of Device			MachGu n	NOT M/Gun
72350	06/18/08	Foeller, [REDACTED]	Bump Fire type stock		NOT		Y
74544	06/07/10	Compton, [REDACTED]	Bump Fire Stock		NOT		Y
75918	11/23/11	Savage, [REDACTED]	AFSA Stock	M/Gun			
76715	04/02/12	Smith, [REDACTED]	BFS & Receiver Module		NOT		Y
76600	07/09/12	McElwaney, [REDACTED]	Rapid Fire Stock		NOT		Y
76598	07/13/12	Vesliagaj, [REDACTED]	Bump Fire Stock		NOT		Y
77918	02/11/13	Foster, [REDACTED]	The "BUMPSKI"		NOT		Y

AR000424

78025	05/01/13	Erskine, [REDACTED]	Bump Fire Stock		NOT		Y
301754	04/10/14	Lindsay, [REDACTED]	Bump Fire Adapter			none given	N/
303826	09/14/15	Ruble, [REDACTED]	Bump Fire Stock/Chassis		NOT		Y
304609	04/06/17	Wolff, [REDACTED]	Bump Fire Stock AR-type		NOT		Y

Earl Griffith  
 United States Department of Justice  
 Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF)  
 Chief, Firearms Ammunition Technology Division  
 Firearms Enforcement Officer  
 244 Needy Road  
 Martinsburg, WV 25405  
 Office 304-267-[REDACTED]



PROTECTING THE PUBLIC  
 SERVING OUR NATION

To: Turk, Ronald B.[Ronald.Turk@atf.gov]  
 Cc: Shaefer, Christopher C.[Christopher.Shaefer@atf.gov]; Gleysteen, Michael[Mike.P.Gleysteen@atf.gov]; Gross, Charles R.[Charles.Gross@atf.gov]; McDermond, James E. [REDACTED]; McMullan, William P. [REDACTED]  
 From: Richardson, Marvin G.  
 Sent: Tue 10/3/2017 9:12:57 PM  
 Subject: FW: Bump stock history  
Research-Bump Fire Stocks-OCT 2017.pdf

FYI. Just received from Earl.

Marvin G. Richardson  
 Assistant Director  
 Bureau of ATF, Enforcement Programs & Services  
 Office (202) 648-[REDACTED]  
 Cell [REDACTED]

"Leaders don't do what they want to do, they do what is right".

From: Griffith, Earl L.  
 Sent: Tuesday, October 3, 2017 5:05 PM  
 To: Richardson, Marvin G. [REDACTED] Allen, Joseph J. [REDACTED]  
 Cc: Gilbert, Curtis W. [REDACTED]  
 Subject: Bump stock history

Gentlemen,

This is all we could find in our data bases.

There are a total of eleven devices.

- (1) we did not evaluate because a physical sample was not included.
- (9) were classified as NOT machineguns.
- (1) was classified as Machinegun.

Below is an inventory of what is included in the attachment in order by date (oldest first).

**Bump Fire / Slide Fire Device Classification - FATD - OCT 2017**

<u>IQ #</u>	<u>Date</u>	<u>Letter Addressed to:</u>		<u>MachGun</u>	<u>Classification</u>		<u>Photo</u>
		<u>Name-who submitted device</u>	<u>Name of Device</u>		<u>NOT M/Gun</u>	<u>None Given</u>	
72350	06/18/08	Foeller, [REDACTED]	Bump Fire type stock		NOT		Y

AR000426



74544	06/07/10	Compton, [REDACTED]	Bump Fire Stock		NOT		Y
75918	11/23/11	Savage, [REDACTED]	AFSA Stock	M/Gun			
76715	04/02/12	Smith, [REDACTED]	BFS & Receiver Module		NOT		Y
76600	07/09/12	McElwaney, [REDACTED]	Rapid Fire Stock		NOT		Y
76598	07/13/12	Vesliagaj, [REDACTED]	Bump Fire Stock		NOT		Y
77918	02/11/13	Foster, [REDACTED]	The "BUMPSKI"		NOT		Y
78025	05/01/13	Erskine, [REDACTED]	Bump Fire Stock		NOT		Y
301754	04/10/14	Lindsay, [REDACTED]	Bump Fire Adapter			none given	N/
303826	09/14/15	Ruble, [REDACTED]	Bump Fire Stock/Chassis		NOT		Y
304609	04/06/17	Wolff, [REDACTED]	Bump Fire Stock AR-type		NOT		Y

Earl Griffith  
United States Department of Justice  
Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF)  
Chief, Firearms Ammunition Technology Division  
Firearms Enforcement Officer  
244 Needy Road  
Martinsburg, WV 25405  
Office 304-267-[REDACTED]



PROTECTING THE PUBLIC  
SERVING OUR NATION

AR000427



## U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

NOT A M/KN

Martinsburg, West Virginia 25405

903050 MRC  
3311/2008-371

www.atf.gov

JUN 18 2008

[REDACTED] Foeller II  
[REDACTED]

Dear Mr. Foeller:

This is in reference to your submitted item, as well as accompanying correspondence, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB). This item, consisting of a metal type shoulder stock, was submitted with a request for classification under the Gun Control Act (GCA) and National Firearms Act (NFA).

As background information, the NFA, 26 U.S.C. Section 5845(b), defines "machinegun" as—

*"...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person."*

The device submitted for evaluation consists of the following:

- Two sections of square metal tubing, the exterior tube measuring approximately 10 x 1-1/2 x 1-1/2 inches. Additionally, a flat piece of metal similar in shape to a butt plate is welded to the rear of the exterior tube.
- An interior tube measuring approximately 12-9/16 x 1-1/4 x 1-1/4 inches.
- A flat piece of metal measuring 4-3/4 x 1-3/8 x 3/16 inches attached by means of welding to the bottom and located on the front of the exterior tubing.
- A cylindrically shaped section of pipe that acts as pistol grip and is attached to the previously described flat piece of metal by means of welding. It measures approximately 4-1/8 inches in length and 1-5/16 inches in diameter.
- A support bar attached to the pistol grip and butt plate by means of welding. It measures approximately 11-1/4 x 13/16 x 3/8 inches.
- Interior tubing that has been drilled and tapped for two oval head screws which are located on the left and right side. These screws are used to stop the rearward movement after a short distance of travel. Additionally, two holes have been drilled and tapped into the top of the interior tube which allow attachment of the device to an AK-type rifle.

AR000428



-2-

 Foeller II

- An exterior-tube slot (1-3/16 inches) milled on the bottom, approximately 4-3/16 inches from the front of the tube. The interior tubing has a hole drilled and tapped to accept an oval head screw. This screw supports the two previously mentioned stop screws on the interior tubing. It also stops the forward travel of the interior tubing after a short distance of travel.

To install this shoulder-stock device on an AK-type rifle, the shoulder stock and independent pistol grip has to be removed. Next, the front of the interior tube has to be inserted into the interior cavity of the receiver of the AK-type rifle, and the attachment screws installed.

The FTB live-fire testing of the submitted device indicates that if, as a shot is fired, an intermediate amount of pressure is applied to the fore-end with the support hand, the shoulder stock device will recoil rearward far enough to allow the trigger to mechanically reset. Continued intermediate pressure applied to the fore-end will then push the receiver assembly forward until the trigger re-contacts the shooter's stationary firing hand finger, allowing a subsequent shot to be fired. In this manner, the shooter pulls the firearm forward to fire each shot, each shot being fired by a single function of the trigger. Further, every subsequent shot depends on the shooter applying the appropriate amount of forward pressure to the fore-end and timing it to contact the trigger finger on the firing hand.

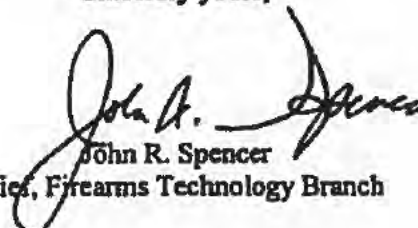
Since your device is incapable of initiating an automatic firing cycle that continues until either the finger is released or the ammunition supply is exhausted, FTB finds that it is NOT a machinegun under the NFA, 26 U.S.C. 5845(b), or the GCA, 18 U.S.C. 921(a)(23).

Please note that this classification is based on the item as submitted. Any changes to its design features or characteristics will void this classification. In addition, we caution that the addition of an accelerator spring or any other non-manual source of energy which allows this device to operate automatically as described will result in the manufacture of a machinegun as defined in the NFA, 26 U.S.C. 5845(b).

Please provide our Branch with a FedEx account number so that we may return this item to you.

We thank you for your inquiry and trust the foregoing has been responsive to your request.

Sincerely yours,

  
John R. Spencer  
Chief, Firearms Technology Branch

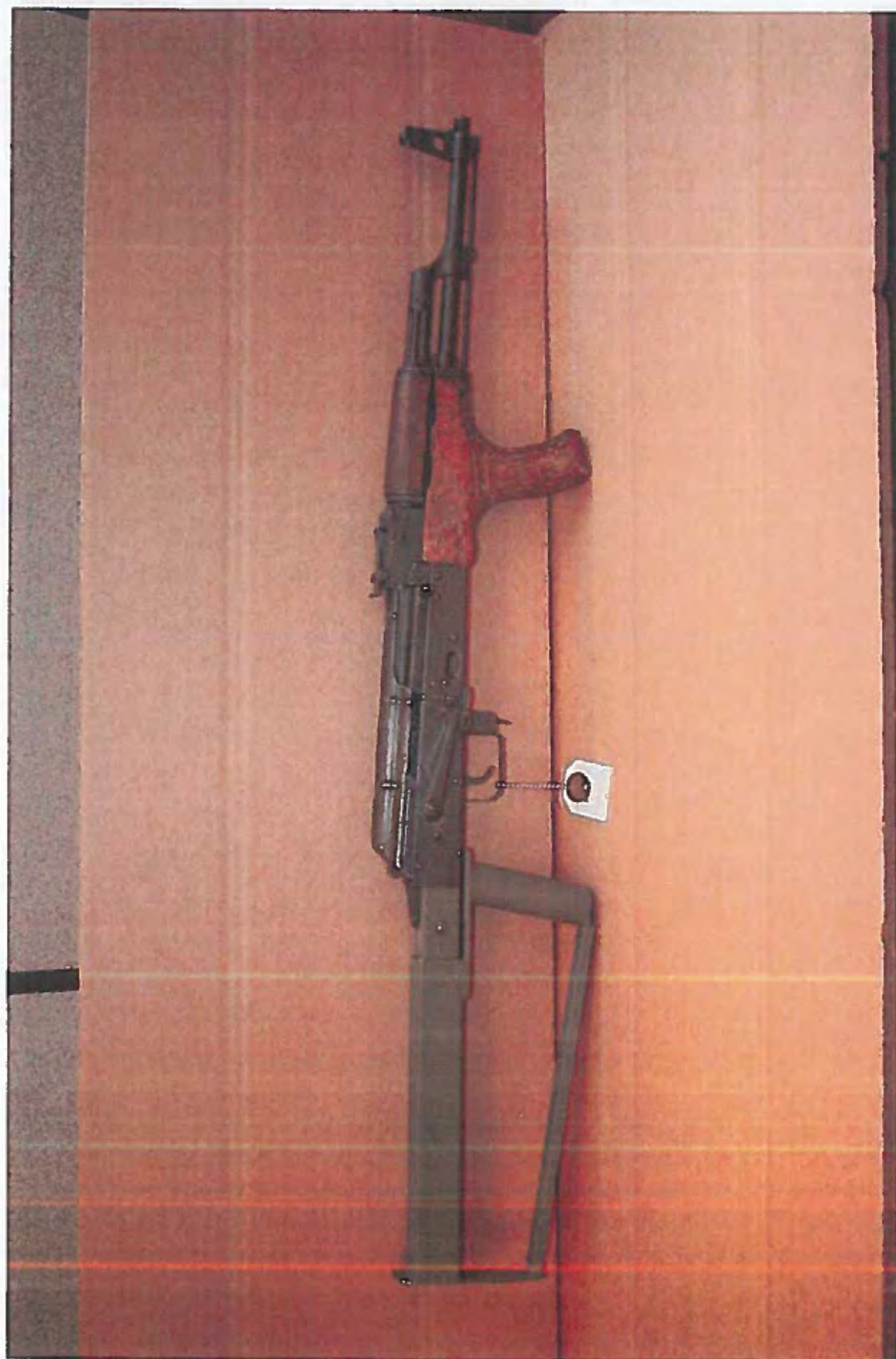
AR000429

72350 -- JUNE 18, 2008 -- Foeller, [REDACTED] -- Bump Fire Stock -- NOT A MACHINEGUN.



AR000430





2008-371

0592L





2008-371

72350



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

114544  
NOT m/ann

Martinsburg, West Virginia 25405

www.atf.gov

JUN 07 2010

903050:MMK  
3311/2010-434

Compton

Dear Mr. Compton:

This is in reference to your submission and accompanying letter to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), asking for an evaluation of a replacement shoulder stock for an AR-15 type rifle. Your letter advises that the stock (referenced in this reply as a "bump-stock") is intended to assist persons whose hands have limited mobility to "bump-fire" an AR-15 type rifle. Your submission includes the following: a block to replace the pistol grip while providing retention for the selector stop spring; a hollow shoulder stock intended to be installed over the rear of an AR-15 fitting with a sliding-stock type buffer-tube assembly; and a set of assembly instructions.

The FTB evaluation confirmed that the submitted stock (see enclosed photos) does attach to the rear of an AR-15 type rifle which has been fitted with a sliding shoulder-stock type buffer-tube assembly. The stock has no automatically functioning mechanical parts or springs and performs no automatic mechanical function when installed. In order to use the installed device, the shooter must apply constant forward pressure with the non-shooting hand and constant rearward pressure with the shooting hand. Accordingly, we find that the "bump-stock" is a firearm part and is not regulated as a firearm under Gun Control Act or the National Firearms Act.

Per your telephoned instructions, we will contact you separately to make return delivery arrangements.

We thank you for your inquiry and trust that the foregoing has been responsive.

Sincerely yours,

John R. Spencer

Chief, Firearms Technology Branch

Enclosure

AR000433









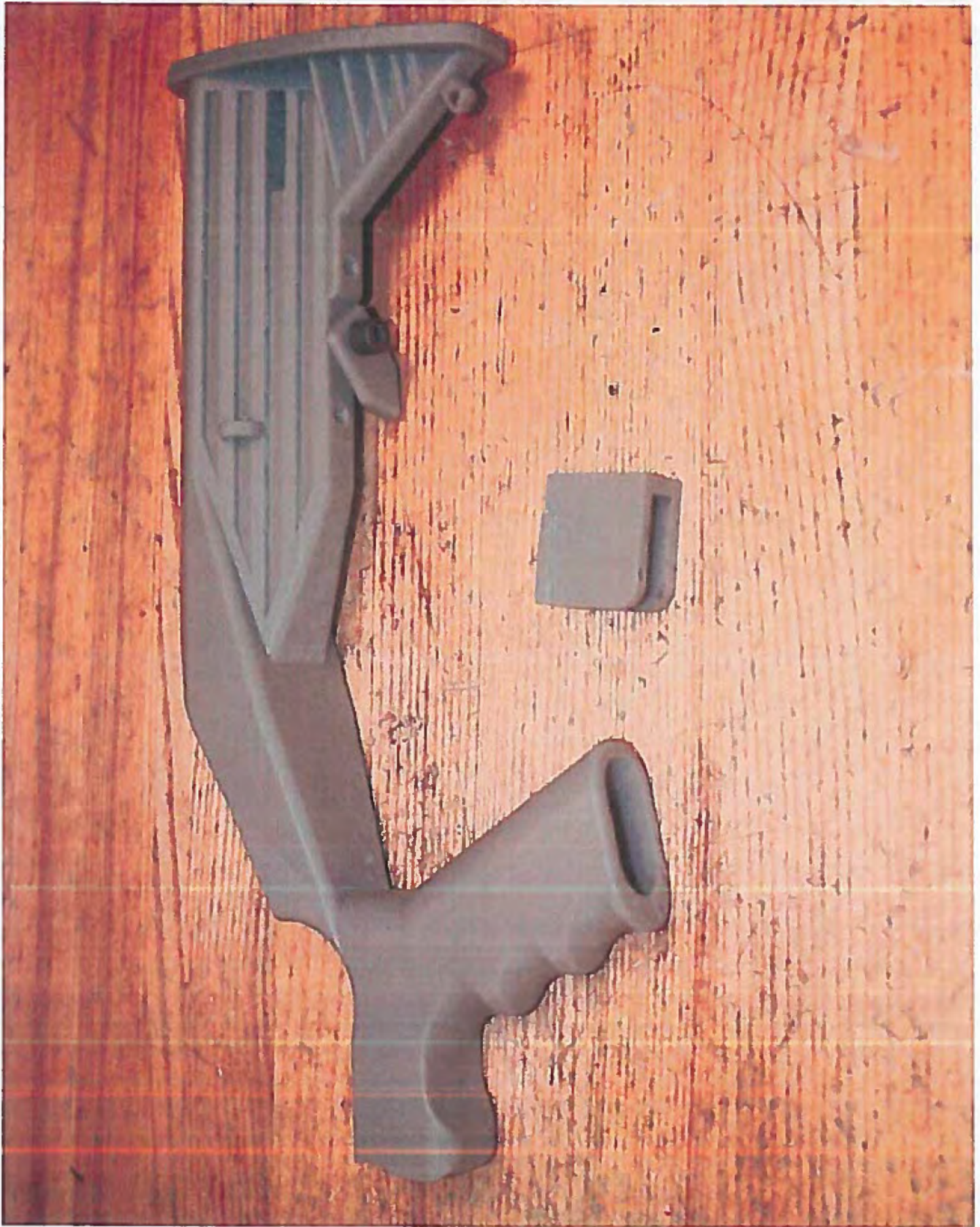
AR000435





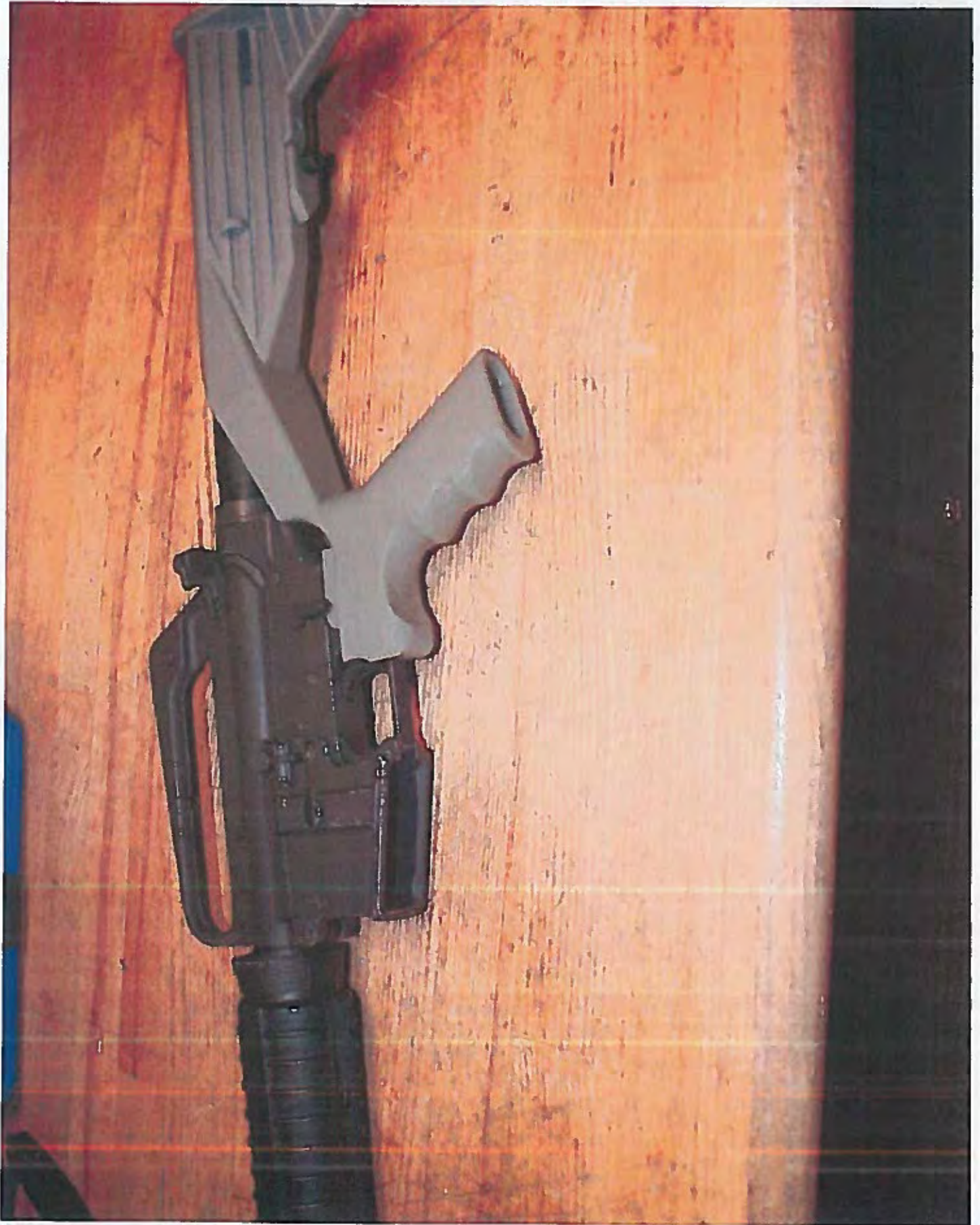
AR000436





AR000437





AR000438



U. S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

## Correspondence Approval and Clearance

903050:MMK  
3311/2010-434

 Compton

Dear Mr. Compton:

This is in reference to your submission and accompanying letter to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), asking for an evaluation of a replacement shoulder stock for an AR-15 type rifle. Your letter advises that the stock (referenced in this reply as a "bump-stock") is intended to assist persons whose hands have limited mobility to "bump-fire" an AR-15 type rifle. Your submission includes the following: a block to replace the pistol grip while providing retention for the selector stop spring; a hollow shoulder stock intended to be installed over the rear of an AR-15 fitting with a sliding-stock type buffer-tube assembly; and a set of assembly instructions.

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Per your telephoned instructions, we will contact you separately to make return delivery arrangements.

We thank you for your inquiry and trust that the foregoing has been responsive.

Sincerely yours,

John R. Spencer  
Chief, Firearms Technology Branch

Enclosure

Code	Initiator	Reviewer	Reviewer	Reviewer	Reviewer	Reviewer	Reviewer
Summarize	903050	903050	903050	903050			
Date	K. O'Neil	MMK					
	5-12-10	5-12-10					

ATF Form 9110-1A (Rev. 10-10-09)

ATF Form 9110-1A  
Rev. 10-10-09

AR000439



EVAL.

2010-434-MMK

[REDACTED] Compton

RECEIVED

BY: [REDACTED]

ph# [REDACTED]

ATTN: Chief John Spencer  
BATFE Firearm Technology Branch  
244 Needy Road  
Martinsburg, WV 25405 USA

To Whom It May Concern:

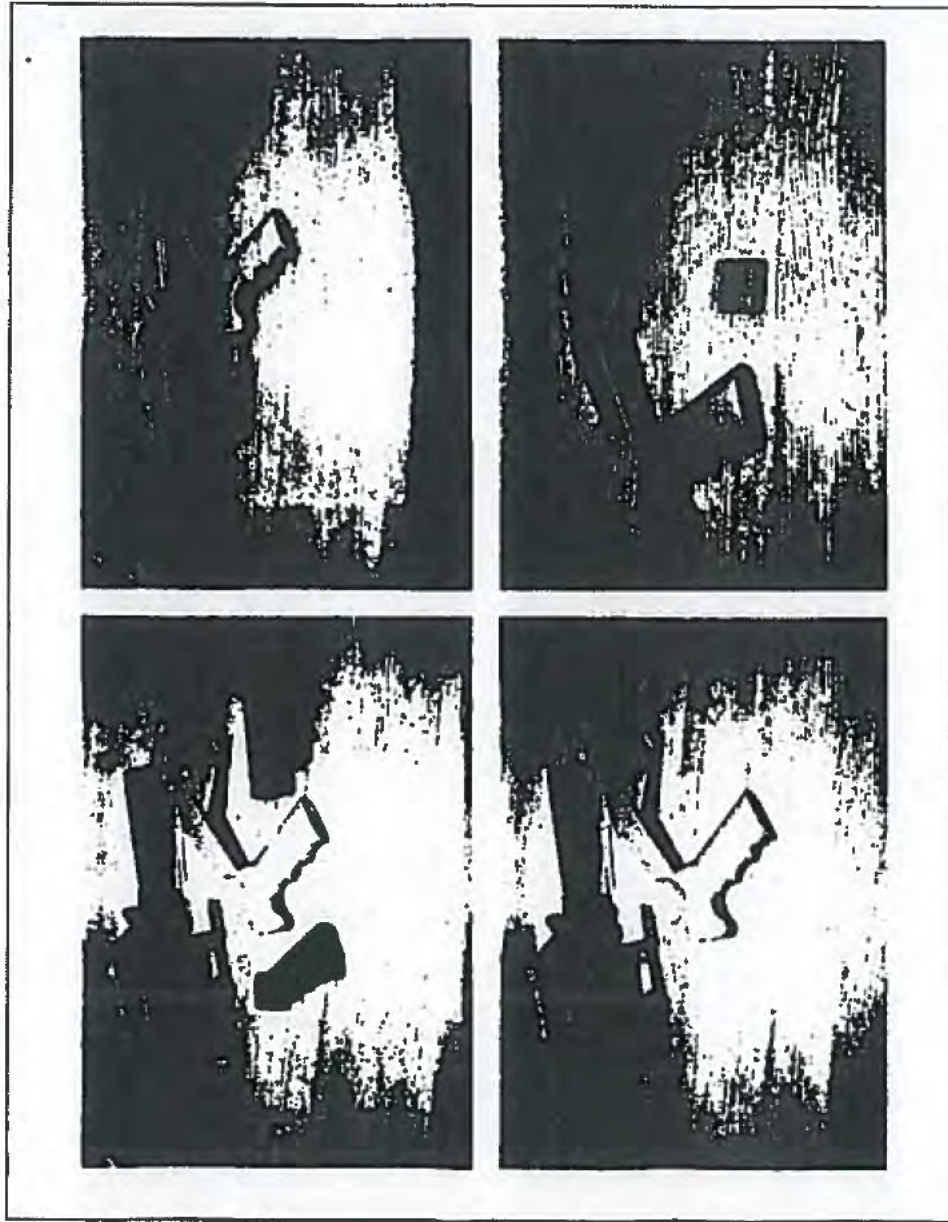
Included in the box is a rifle stock that I had made for my standard AR-15 rifle. I have included an instruction pamphlet explaining how to install the stock on a standard AR-15 rifle. The stock has a finger rest located on the left side of the pistol grip. There is also a two position switch that locks the stock in place or allows the stock to slide a 1/2" when bump-firing. I have found that this is much safer than just removing the locking pin on my standard rifle stock, and this also allows me to properly hold the rifle when I am shooting. It also has the added benefit of allowing someone with limited mobility in their fingers the ability to use their off-hand to assist them in firing the rifle. This is an alternative to the standard rifle stock, but I wanted to ensure that it was not violating any Federal laws. If you would please review the rifle stock and inform me of your decision I would greatly appreciate it. You may contact me at the above listed address or via email at: [REDACTED]

Sincerely,

[REDACTED] Compton

AR000440

74544 – JUN 7, 2010 – Compton, [REDACTED] – Bump Fire Stock – NOT A MACHINEGUN



AR000441





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

16715

NOT machine

Martinsburg, West Virginia 25405

www.atf.gov

903050:MRC  
3311/2012-196

Smith

APR 02 2012

Dear Mr. Smith

This is in reference to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), requesting FTB to evaluate an accompanying stock and determine if its design would violate any Federal statutes.

As background information, the National Firearms Act (NFA), 26 U.S.C. Section 5845(b), defines "machinegun" as—

*"...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person."*

The FTB evaluation confirmed that you have submitted a plastic shoulder stock designed to function on an AR-15 type rifle (see enclosed photos). For your stock to function in the manner intended, it has to be attached to an AR-15 type platform that is assembled with a collapsible-stock receiver extension. Along with the shoulder stock, you have submitted what you have identified as a "receiver module." This module is a plastic block approximately 1-5/16 inches high, about 1-3/8 inches long, and approximately 7/8-inch wide. Additionally, there are two extensions, one on each side, that are designed to travel in the two slots configured on the shoulder stock. The receiver module replaces the AR-15 pistol grip.

Further, the submitted custom shoulder stock incorporates a pistol grip. This grip section has a cavity for the receiver module to move forward and backward. Additionally, two slots have been cut for the receiver module extensions to travel in. The upper section of the shoulder stock is designed to encapsulate the collapsible receiver extension. Further, the custom stock is

AR000442



-2-

 Smith

designed with a "lock pin." When the handle on the lock pin is facing in the 3- to 9-o'clock positions, the stock is fixed and will not move; and when the handle on the lock pin is facing in the 12- to 6-o'clock positions, the stock is movable.

The FTB live-fire testing of the submitted device indicates that if, as a shot is fired, an intermediate amount of pressure is applied to the fore-end with the support hand, the shoulder stock device will recoil sufficiently rearward to allow the trigger to mechanically reset. Continued intermediate pressure applied to the fore-end will then push the receiver assembly forward until the trigger re-contacts the shooter's stationary firing hand finger, allowing a subsequent shot to be fired. In this manner, the shooter pulls the firearm forward to fire each shot, the firing of each shot being accomplished by a single trigger function. Further, each subsequent shot depends on the shooter applying the appropriate amount of forward pressure to the fore-end and timing it to contact the trigger finger on the firing hand, while maintaining constant pressure on the trigger itself.

Since your device is incapable of initiating an automatic firing cycle that continues until either the finger is released or the ammunition supply is exhausted, FTB finds that it is not a machinegun as defined under the NFA, 26 U.S.C. 5845(b), or the Gun Control Act, 18 U.S.C. 921(a)(23).

Please be advised that our findings are based on the item as submitted. Any changes to its design features or characteristics will void this classification. Further, we caution that the addition of an accelerator spring or any other non-manual source of energy which allows this device to operate automatically as described will result in the manufacture of a machinegun as defined in the NFA, 5845(b).

To facilitate the return of your sample, to include the module, please provide FTB with the appropriate FedEx or similar account information within 60 days of receipt of this letter. If their return is not necessary, please fax FTB at 304-616-4301 with authorization to destroy them on your behalf.

We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request.

Sincerely yours,



John R. Spencer  
Chief, Firearms Technology Branch

Enclosure

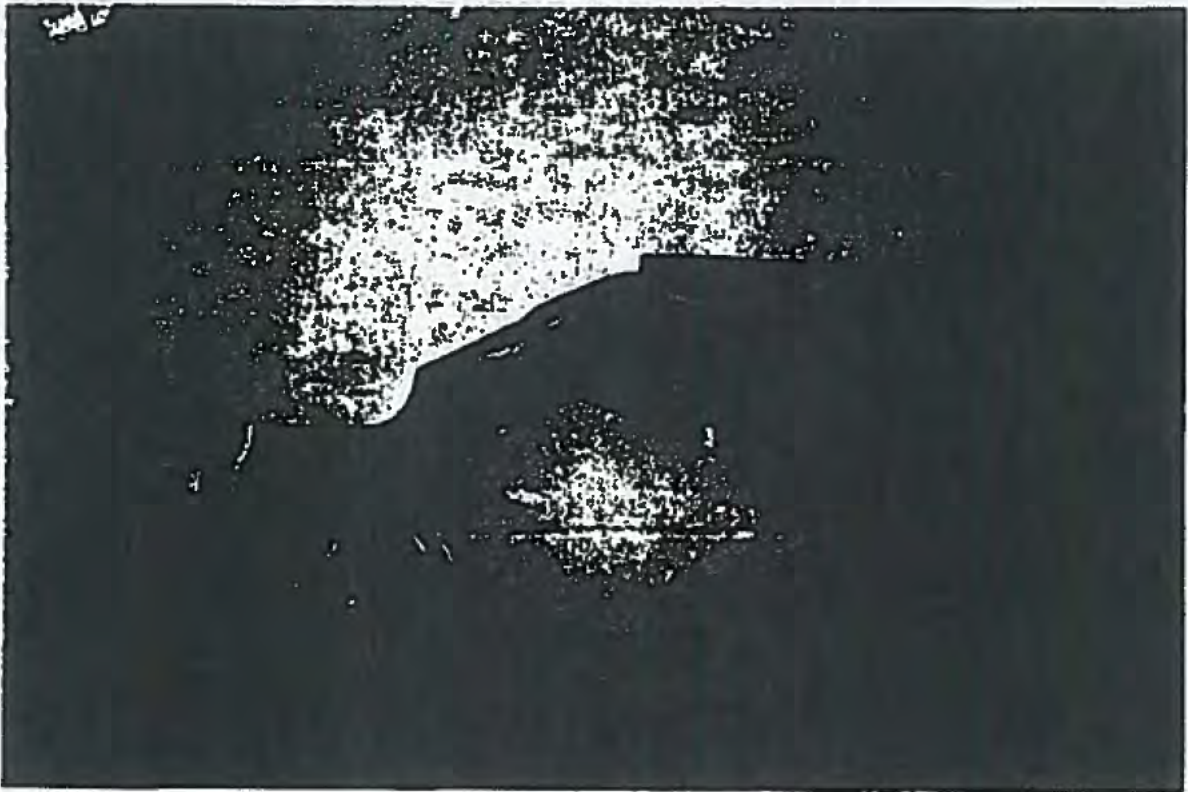
AR000443



-3-

Smith

Custom Alternative Stock for AR-15 type rifle

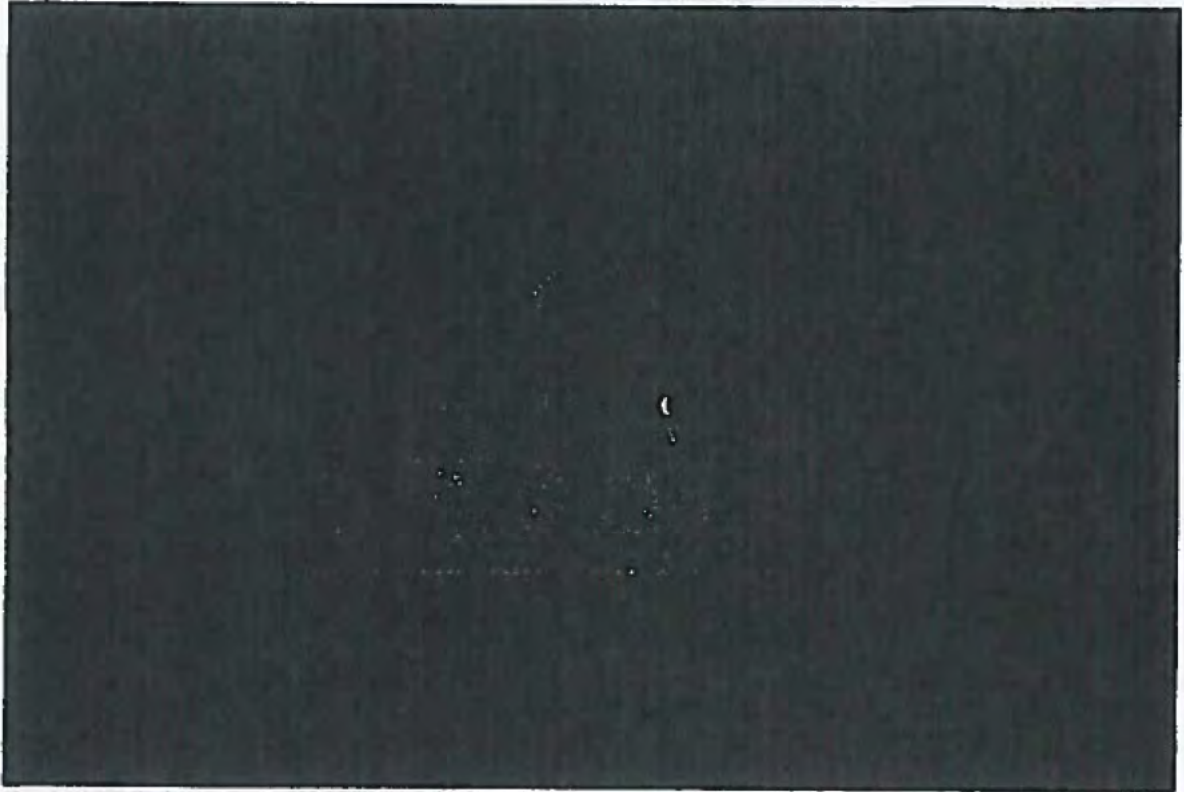


AR000444

-4-

 Smith

**Custom Stock Installed on AR-15 type Rifle**



AR000445





2012-196

Smith, [REDACTED]

76715





2012-196

Smith, [REDACTED]

76715





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

7/6600

NOT m/rum

www.atf.gov

903050:AG  
3311/2012-081

JUL 09 2012

McElwaney  
Saigatechusa/Ramlake, LLC

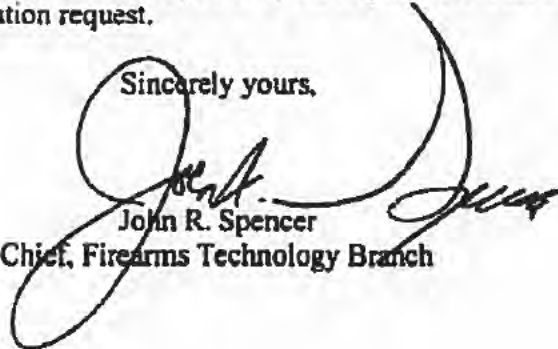
Dear Mr. McElwaney:

This is in reference to your recent submission and accompanying letter to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), asking for an evaluation of a replacement shoulder stock for a Saiga-12 type shotgun. Your letter advises that the stock (referenced in this reply as a "Rapid Fire Stock") is intended to assist persons with limited mobility to "bump-fire" an AK-type weapon (such as the Saiga-12 shotgun). The submitted Saiga-12 shotgun has been fitted with an AR-15 stock adapter, as well as a modified, AR-15 type, collapsible stock assembly. The modified assembly incorporates a trigger finger stop and allows the shotgun to slide back and forth, independently of the shoulder stock and pistol grip.

The FTB evaluation confirmed that the submitted stock (see enclosed photos) has no automatically functioning mechanical parts or springs and performs no automatic mechanical function when installed. In order to use the installed device, the shooter must apply constant forward pressure with the non-shooting hand and constant rearward pressure with the shooting hand. Accordingly, we find that the "Rapid Fire Stock" is a firearm part and is not regulated as a firearm under Gun Control Act or the National Firearms Act.

Please note that this determination pertains to the Rapid Fire Stock as received and evaluated by our Branch. Any changes to the design features or physical characteristics of the Rapid Fire Stock will void this classification. We thank you for your inquiry and trust that the foregoing has been responsive to your evaluation request.

Sincerely yours,

  
John R. Spencer  
Chief, Firearms Technology Branch

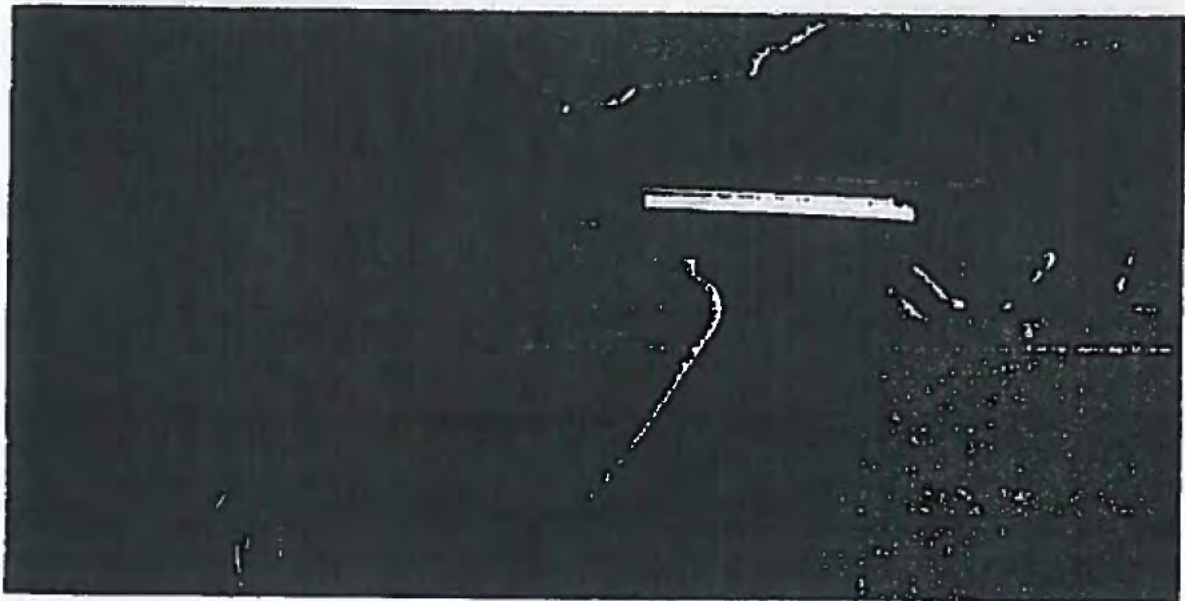
Enclosure

AR000448

-2-

McElwaney

Submitted item:



AR000449



EVAL.

2012-081-AG

Rapid Fire Stock

This device assist persons with limited mobility to bumpfire an AK style weapon.

Consist of a sliding buttstock on tube with a finger stop attached to a sliding bearing plate / pistol grip adapter.

There are no springs or automatic function in this design.


The trigger is activated by the finger for each shot and the user must reset the trigger after each shot.

Thank you for your assistance.

Sincerely

 McElwaney

Saigatechusa / Ramlake LLC





RECEIVED  
OCT 28 2011

BY: F.T.B.

SAIGA-12

w/ attached bumpfire stock



## U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and ExplosivesMartinsburg, West Virginia 25405  
www.atf.gov903050:AG  
3311/2012-081

McElwaney  
Saigatechusa/Ramlake, LLC

Dear Mr. McElwaney:

This is in reference to your recent submission and accompanying letter to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), asking for an evaluation of a replacement shoulder stock for a Saiga-12 type shotgun. Your letter advises that the stock (referenced in this reply as a "Rapid Fire Stock") is intended to assist persons with limited mobility to "bump-fire" an AK-type weapon (such as the Saiga-12 shotgun). The submitted Saiga-12 shotgun has been fitted with an AR-15 stock adapter, as well as a modified, AR-15 type, collapsible stock assembly. The modified assembly incorporates a trigger finger stop and allows the shotgun to slide back and forth, independently of the shoulder stock and pistol grip.

OK  
The FTB evaluation confirmed that the submitted stock (see enclosed photos) has no automatically functioning mechanical parts or springs and performs no automatic mechanical function when installed. In order to use the installed device, the shooter must apply constant forward pressure with the non-shooting hand and constant rearward pressure with the shooting hand. Accordingly, we find that the "Rapid Fire Stock" is a firearm part and is not regulated as a firearm under Gun Control Act or the National Firearms Act. → or point down?

Please note that this determination pertains to the Rapid Fire Stock as received and evaluated by our Branch. Any changes to the design features or physical characteristics of the Rapid Fire Stock will void this classification. We thank you for your inquiry and trust that the foregoing has been responsive to your evaluation request.

Sincerely yours,

Counsel

John R. Spencer  
Chief, Firearms Technology Branch

11-7-11

Enclosure

Will this fire automatically when pointed down?  
We now know that this is a possibility and we need to be prepared to address this

~~See attached file~~

AR000451



76600 -- JUL 9, 2012 - McElwaney [REDACTED] -- RAPID FIRE STOCK -- Bump Fire Type Stock -- NOT A MACHINEGUN





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

NOT in/over

Martinsburg, West Virginia 25405

www.atf.gov

903050:MSK  
3311/2012-079

[REDACTED] Vesligaj  
Phoenix Technology, Ltd.  
[REDACTED]

JUL 13 2012

Dear Mr. Vesligaj:

This is in reference to your sample, as well as accompanying correspondence, which was submitted to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). The sample, consisting of a replacement "bump fire" type stock designed for use with a semiautomatic AK-pattern type rifle, was furnished to FTB with a request for classification under Federal firearms laws. (As received, the left-side wall of this stock was cracked.)

As you know, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines the term "machinegun" as—

*...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.*

Further, ATF Ruling 2006-2 describes a device that is designed and intended to accelerate the rate of fire of a semiautomatic weapon and classifies it as follows:

*Held, a device (consisting of a block replacing the original manufacturer's V-Block of a Ruger 10/22 rifle with two attached rods approximately ¼ inch in diameter and approximately 6 inches in length; a second block, approximately 3 inches long, 1 ¼ inches wide, and ¼ inch high, machined to allow the two guide rods of the first block to pass through; the second block supporting the guide rods and attached to the stock; using ¼ inch rods; metal washers; rubber and metal bushings; two collars with set screws; one coiled spring; C-clamps; a split ring; the*

AR000453



-2-

Vesligaj

*two blocks assembled together with the composite stock) that is designed to attach to a firearm and, when activated by a single pull of the trigger, initiates an automatic firing cycle that continues until either the finger is released or the ammunition supply is exhausted, is a machinegun under the NFA, 26 U.S.C. 5845(b), and the ...[Gun Control Act: GCA]... 18 U.S.C. 921(a)(23).*

The submitted device (also see enclosure) incorporates the following features or characteristics:

- A plastic block which is designed to be inserted into the rear section of a stamped AK-type receiver and secures the "burst stock" to the remainder of the weapon utilizing the factory tang of the AKM rifle. This block is attached to a pistol-like assembly which reciprocates within a hollow metal buffer-style tube attached to the rear section of your stock.
- A collapsible AR-15 style shoulder stock.
- An attached pistol grip assembly.
- Two screws used to secure your stock to the AKM rifle.
- The stock's lack of any operating springs, bands, or other devices which would permit automatic firing.

Your stock is designed to allow the AKM-type semiautomatic rifle mounted to it to reciprocate back and forth in a linear motion. The absence of an accelerator spring or similar component in the submitted device prevents it from operating automatically as described in ATF Ruling 2006-2. When operated, forward pressure must be applied to the forward handguard/fore-end of the AKM rifle mounted to your stock with the support hand, bringing the receiver assembly forward to a point where the trigger can be pulled by the firing hand. If sufficient forward pressure is not applied to the handguard with the support hand, the rifle can be fired in a conventional semiautomatic manner since the reciprocation of the receiver assembly is eliminated.

The FTB examination of the submitted device indicates that if, as a shot is fired and a sufficient amount of pressure is applied to the handguard/gripping surface with the shooter's support hand, the AKM rifle assembly will come forward until the trigger re-contacts the shooter's stationary firing-hand trigger finger, allowing a subsequent shot to be fired. In this manner, the shooter pulls the receiver assembly forward to fire each shot, each shot being fired by a single function of the trigger.

Since your device does not initiate an automatic firing cycle by a single function of the trigger, FTB finds that it is NOT a machinegun under the NFA, 26 U.S.C. 5845(b), or the GCA, 18 U.S.C. 921(a)(23).

AR000454

-3-

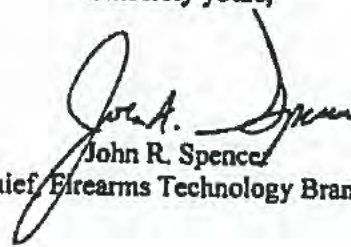
 Vestligaj

We caution that our findings are based on the item as submitted. Any changes to its design features or characteristics will void this classification. Moreover, we should point out that the addition of an accelerator spring or any other non-manual source of energy which allows this device to operate automatically as described in Ruling 2006-2 will result in the manufacture of a machinegun as defined in the NFA, 26 U.S.C. 5845(b).

Please provide our Branch with a FedEx account number so that we may return this item.

We thank you for your inquiry and trust that the foregoing has been responsive to your evaluation request.

Sincerely yours,

  
John R. Spencer  
Chief, Firearms Technology Branch

Enclosure

AR000455



**MAKE SURE WEAPON IS UNLOADED BEFORE STARTING!!**

Remove existing factory stock from AK.

Remove the two top screws from Phoenix replacement stock.

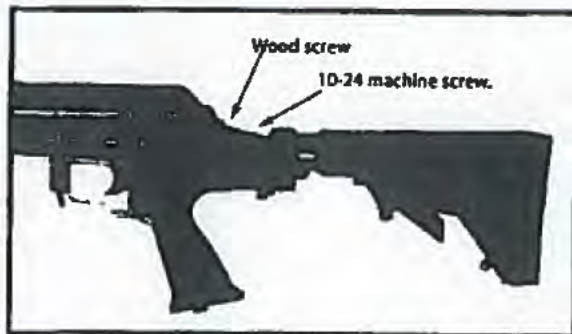
Insert the stock snugly into back of stamped receiver.

Install wood screw in front of replacement stock first. Ensure it is snug but not tight.

Install 10-24 screw with included allen wrench and tighten securely

Tighten wood screw.

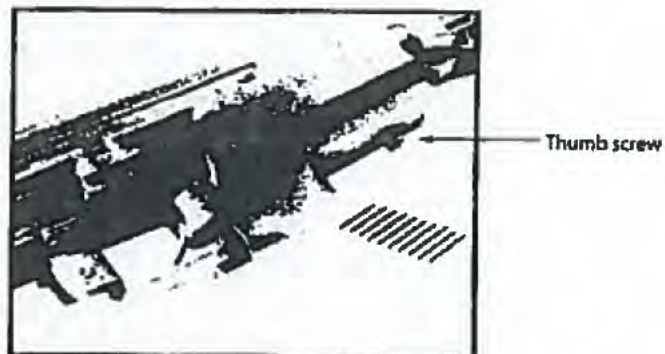
Adjust length of pull to shooter's comfort.



The stock is ready to be fired in semi-automatic when initially installed. The thumb screw (behind the pistol grip) is engaged into mounting housing.

For bump-fire, unscrew the thumb screw to the stop (it will not fall out). Stock is now ready for bump-fire capability.

For bump-fire, apply forward pressure to forend with non-shooting hand. Apply pressure towards shoulder with shooting hand.





## Phoenix Technology, Ltd.

RECEIVED  
OCT 27 2011

BY: F.T.B.

OCT 27 2011

F.T.B.

ATTN: Chief John Spencer  
BATFE Firearm Technology Branch  
244 Needy Road  
Martinsburg, WV 25405

October 24, 2011

EVAL.

2012-079-MSK

**To Whom It May Concern:**

Included in the box is a prototype sample of a bump firing stock we have designed for an AK-47 with an AR-15 type tube and stock (not the original AK stock). Our stock is designed for use on AK-47 models with the stamped receivers. A similar design would accommodate the Ruger Mini 14, the Saiga .308, or other firearms that have gas reloading capabilities.

This particular stock will not accommodate the AR-15 rifle due to the fact that the commercial tube is used to reload/return the bolt back to firing position.

Our prototype stock has a 5-position adjustment on buttstock to allow for different lengths of pull. There is a screw located behind the trigger housing which locks the stock firmly together with the rifle for conventional firing operation. Alternatively, the screw can be unscrewed to allow the stock to become a sliding pistol grip to allow bump fire, with the grip sliding in a 1/2 inch range. The finger rest can be mounted on either side of the trigger housing to accommodate left or right handed shooters.

In order to bump fire, you need to apply pressure to push forend forward, while your shooting hand (holding pistol grip) is pulling against your shoulder.

Detailed instructions on how to assemble onto an AK-47 are on next page. Please find enclosed shipping label to return stock after your review.

We feel this is a nice functional replacement stock, but want to be sure we are not in violation of any federal laws before we pursue it any further. This is a hand-made sample. We appreciate your time and consideration, and look forward to your response. If you have any questions, you may contact me at the address/phone number below, or e-mail me at

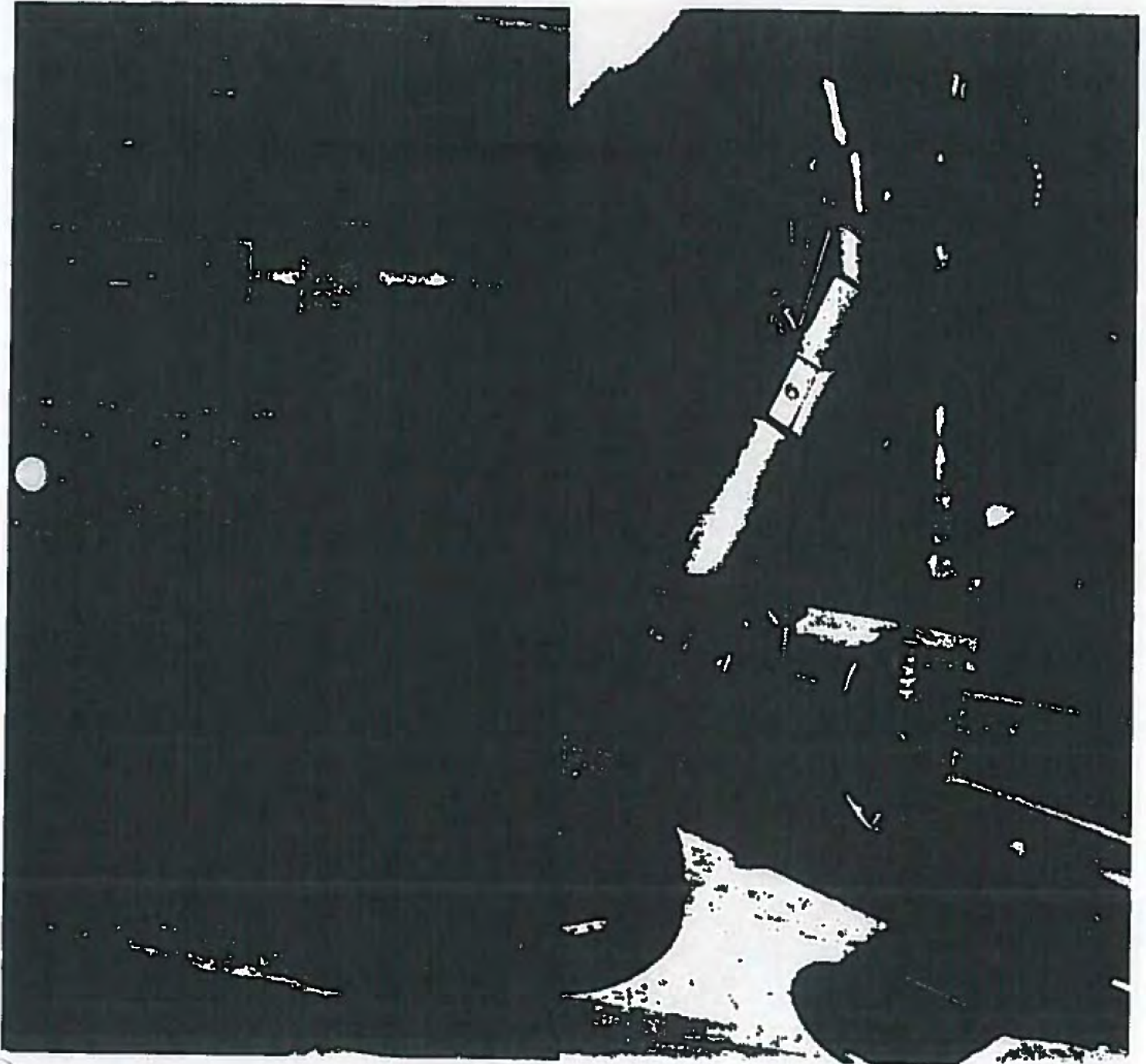
Sincerely,

[Redacted Signature]  
[Redacted Name] Vesligaj

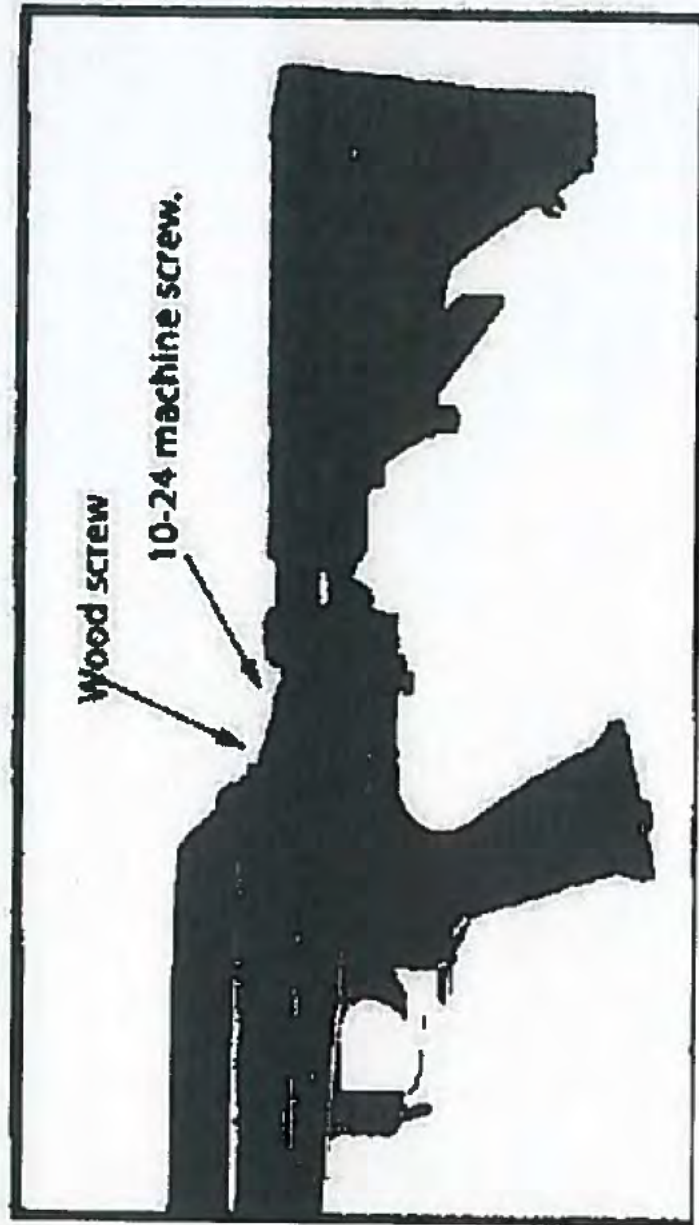
210 Progress Drive • P.O. Box 249 • Burgaw, NC 28425  
Telephone 910-259-6804 • Fax 910-259-6805

AR000457





76598 – JULY 13, 2012 – Vesliagaj, [REDACTED] – Bump Fire Stock (for AK) – NOT A MACHINEGUN







U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

1/19/18

NOT M/A

Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives

www.atf.gov

FEB 11 2013

903050;WJS  
3311/2013-149

[REDACTED] Foster  
FosTech Outdoors, LLC  
[REDACTED]

Dear Mr. Foster:

This is in reference to your sample, as well as accompanying correspondence, which was submitted to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB). The sample, consisting of a replacement "bump-fire" type stock (or "Bumpski") designed for use with a semiautomatic AK-pattern type rifle, was furnished to FTB for classification under Federal firearms laws.

As you know, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines the term "**machinegun**" as—

*...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.*

The submitted device (see enclosed photos) incorporates the following features or characteristics:

- A non-ferrous metal "upper portion" of the stock, designed for insertion into the rear section of a stamped AK-type receiver and, also, for securing the "Bumpski" to the remainder of the weapon utilizing the factory tang of the AKM rifle.
- "Lower portion" to which this "upper portion" is assembled: The "lower" consists of a pistol-gripped assembly which reciprocates within the "upper portion" of the buttstock.
- Four screws used to secure your stock to the AKM rifle.
- A "selector bar" to prevent linear movement of the non-ferrous "lower portion" of the stock.
- Lack of any operating springs, bands, or other parts which would permit automatic firing.

AR000460

-2-

 Foster

Your stock is designed to allow the AKM-type semiautomatic rifle mounted to it to reciprocate back and forth in a linear motion. The absence of an accelerator spring or similar component in the submitted device prevents it from operating automatically. When operated, forward pressure must be applied with the support hand to the forward handguard/fore-end of the AKM rifle mounted to your stock, bringing the receiver assembly forward to a point where the trigger can be pulled by the firing hand. If sufficient forward pressure is not applied to the handguard with the support hand, the rifle can be fired in a conventional semiautomatic manner since the reciprocation of the receiver assembly is eliminated.

The FTB examination of the submitted device indicates that if, as a shot is fired and a sufficient amount of pressure is applied to the handguard/gripping surface with the shooter's support hand, the AKM rifle assembly will come forward until the trigger re-contacts the shooter's stationary firing-hand trigger finger, allowing a subsequent shot to be fired. In this manner, the shooter pulls the receiver assembly forward to fire each shot, each shot being fired by a single function of the trigger.

Since your device does not initiate an automatic firing cycle by a single function of the trigger, FTB finds that it is NOT a machinegun under the NFA, 26 U.S.C. 5845(b), or the amended Gun Control Act of 1968, 18 U.S.C. § 921(a)(23).

We caution that our findings are based on the item as submitted. Any changes to its design features or characteristics will void this classification. Moreover, we should point out that the addition of an accelerator spring or any other non-manual source of energy which allows this device to operate automatically will result in the manufacture of a machinegun as defined in the NFA, 5845(b).

We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request.

Sincerely yours,

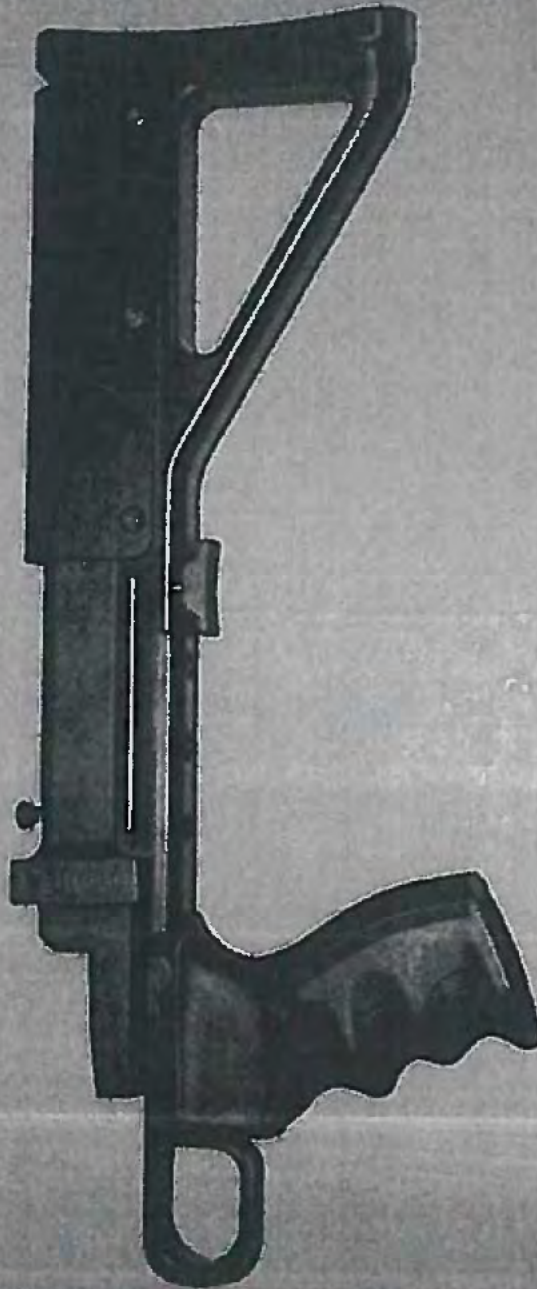
  
John R. Spencer  
Chief, Firearms Technology Branch

Enclosure

AR000461



Fostech Outdoors "BUMPSKI"  
Submitted 11/6/2012

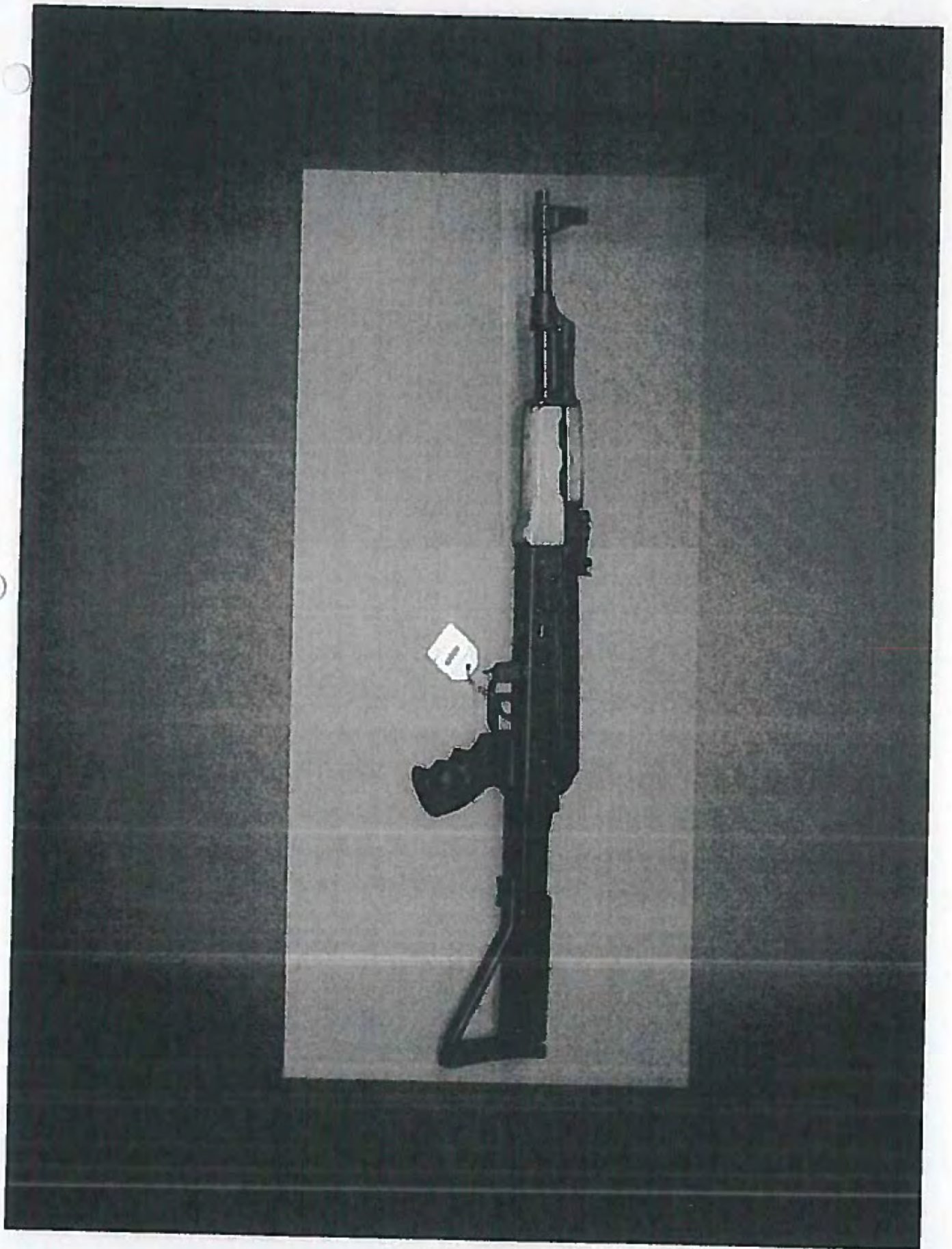






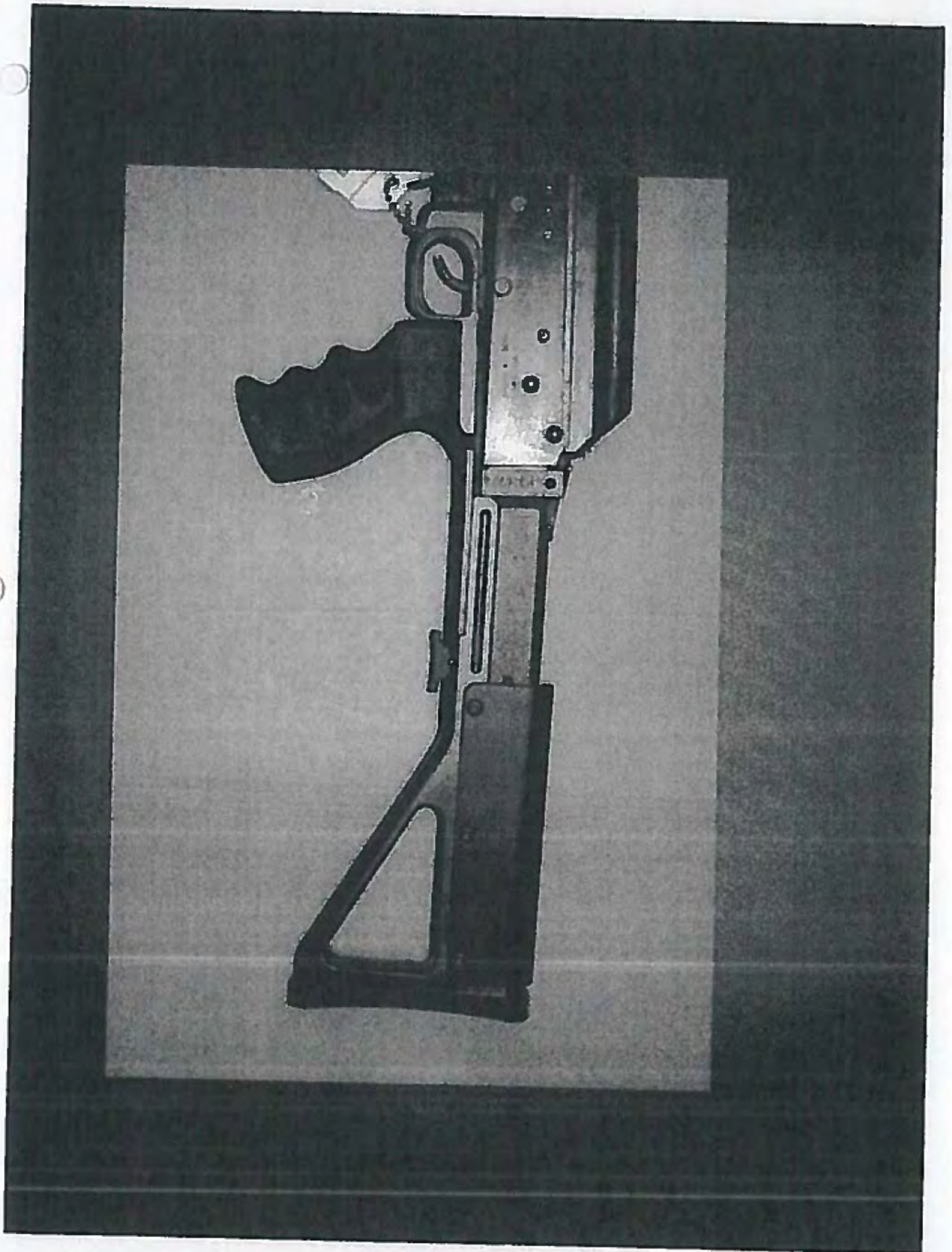
AR000463





AR000464





AR000465



77918 – Foster, [REDACTED] – FEB 11, 2013 – “BUMPSKI” - Bump Fire type stock – NOT A MACHINEGUN





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

7825

NOT M/Gun

Martinsburg, WV 25405

www.atf.gov

903050:WJS  
3311/78025

May 1, 2013

Erskine

Dear Mr. Erskine,

This is in reference to your sample, as well as accompanying correspondence, which was submitted in December 2012 to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), for classification under Federal firearms laws. The sample—which you call “the HailStorm”—consists of a replacement “bump-fire” type stock designed for use with a semiautomatic AR-15 type rifle.

As you know, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines the term “machinegun” as—

...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

The submitted device (see enclosed photos) incorporates the following features or characteristics:

- A plastic, adjustable AR-type buttstock “anchor tube” that is designed to be installed onto the buffer tube of an AR-type firearm and, also, to house the “stabilizer bar.”
- A “stock adjusting pin” to prevent linear movement of the “anchor tube” while it is installed to the buffer tube.

AR000467



[REDACTED] Erskine

Page 2

- Lack of any operating springs, bands, or other parts which would permit automatic firing.

Your stock is designed to allow the AR-type semiautomatic rifle mounted to it to reciprocate back and forth in a linear motion. The absence of an accelerator spring or similar component in the submitted device prevents it from operating automatically. When operated, forward pressure must be applied with the support hand to the forward handguard/fore-end of the AR-type rifle mounted to your stock, bringing the receiver assembly forward to a point where the trigger can be pulled by the firing hand. If sufficient forward pressure is not applied to the handguard with the support hand, the rifle can be fired in a conventional, semiautomatic manner since the reciprocation of the receiver assembly is eliminated.

The FTB examination of the submitted device indicates that if as a shot is fired—and a sufficient amount of pressure is applied to the handguard/gripping surface with the shooter's support hand—the AR-type rifle assembly will come forward until the trigger re-contacts the shooter's stationary firing-hand trigger finger. Re-contacting allows the firing of a subsequent shot. In this manner, the shooter pulls the receiver assembly forward to fire each shot, each succeeding shot firing with a single trigger function.

Since your device does not initiate an automatic firing cycle by a single function of the trigger, FTB finds that it is NOT a machinegun under the NFA, 26 U.S.C. 5845(b), or the amended Gun Control Act of 1968, 18 U.S.C. § 921(a)(23).

We caution that our findings are based on the item as submitted. Any changes to its design features or characteristics will void this classification. Moreover, we should point out that the addition of an accelerator spring or any other non-manual source of energy which allows this device to operate automatically will result in the manufacture of a "machinegun" as defined in the NFA, 5845(b).

We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request.

Sincerely yours,

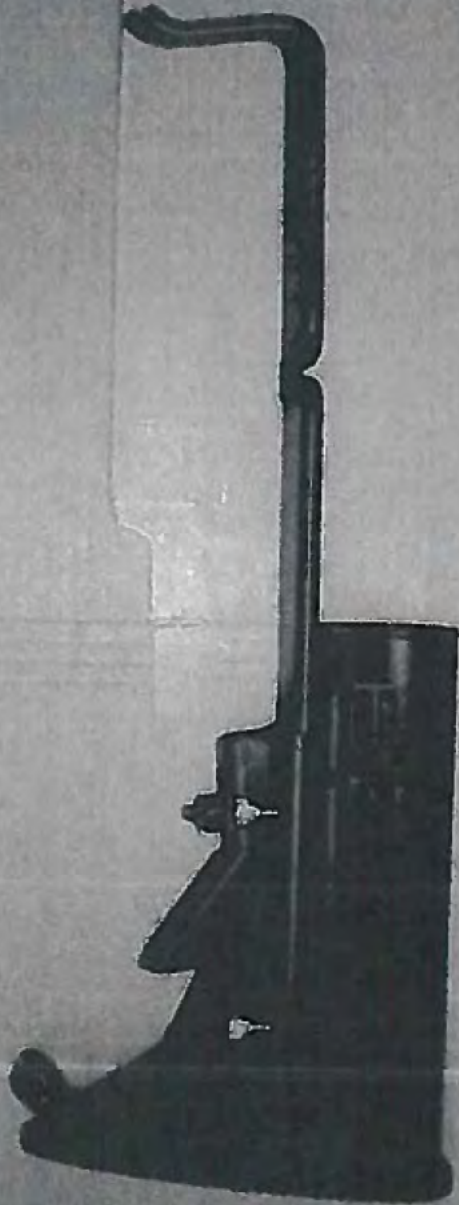
  
Earl Griffith

Chief, Firearms Technology Branch

AR000468



Hail Storm Stock, Photograph #1

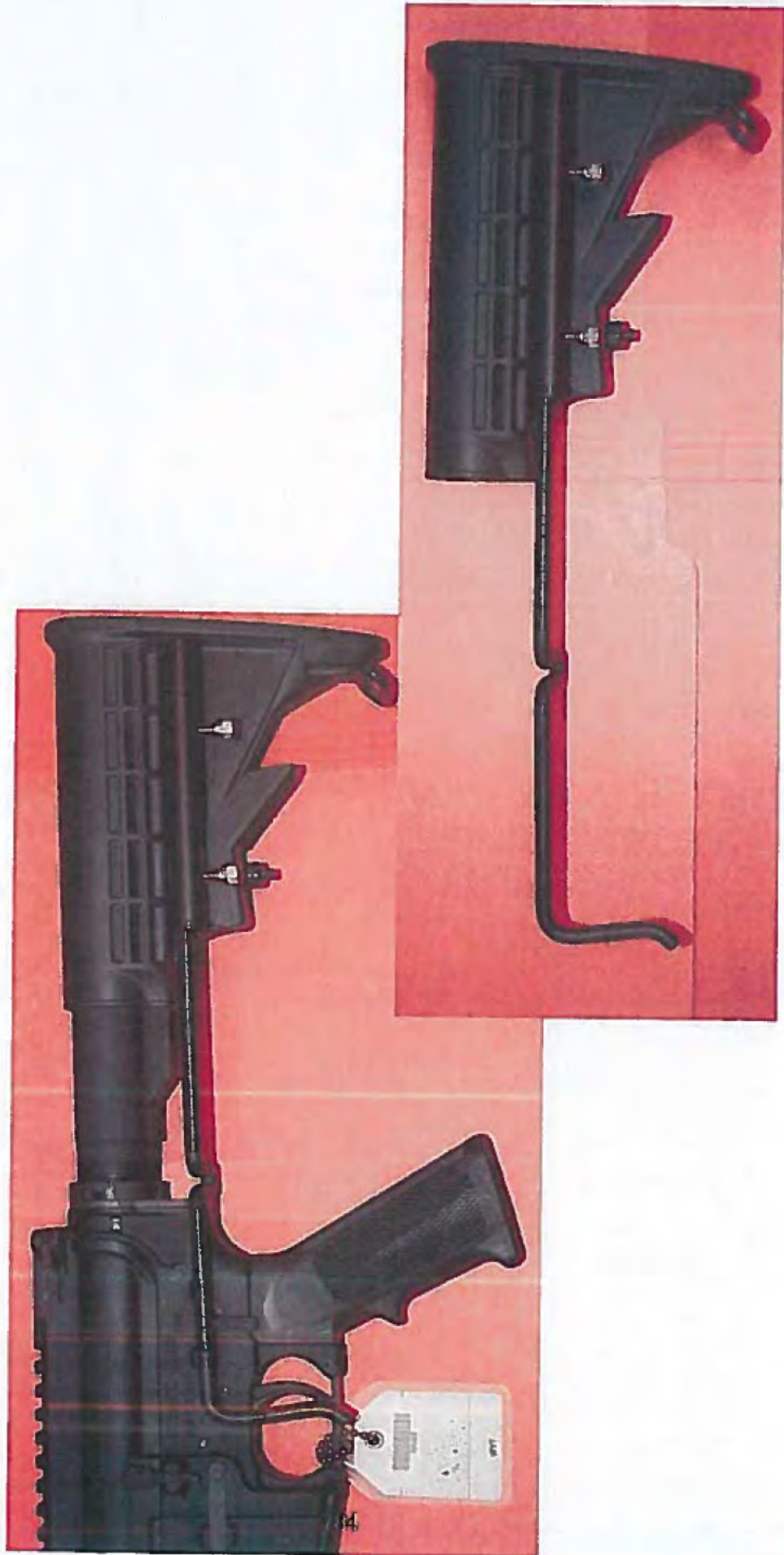




# Hail Storm Stock, Photograph #2



78025 – MAY 1, 2013 -- Erskine, [REDACTED] – Bump Fire Stock – NOT A MACHINEGUN



AR000471





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

301754

NOT m/gun  
\*NOT Submitted

Martinsburg, W' 25403

www.atf.gov

903050:MCP  
3311/301754

APR 10 2014

[REDACTED] Lindsay

Dear [REDACTED] Lindsay,

This refers to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), which accompanied your submitted sample of a device you describe as a bump-fire adapter. Specifically, you requested an evaluation and classification of this item.

As you may be aware, the amended Gun Control Act of 1968, 18 U.S.C. § 921(a)(3), defines the term "firearm" to include *...any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and] ...the frame or receiver of any such weapon....*

Further, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines "machinegun" as follows:

*...any weapon which shoots, is designed to shoot, or can be readily restored to shoot automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.*

In your correspondence, you have requested ATF to modify one of its own rifles in order to evaluate and classify your submitted device; however, ATF divisions, branches, etc., are constrained from doing so. In order for FTB to classify your device, please submit a properly functioning sample that is already installed on a rifle.

AR000472

████████ Lindsay


Page 2

We caution that if the manufacture of this item would result in the assembly of a "machinegun" as defined by the NFA, FTB could neither solicit nor sanction its unlawful production. Also, you should confirm that the manufacture of this device does not violate any State or local laws and ordinances.

In conclusion, if the FTB evaluation were to determine that the submitted sample is a "machinegun" as defined in the NFA, we would be unable to return it unless you are a licensed manufacturer and have paid the special occupational tax ("SOT"). Conversely, if FTB finds that the sample is not a "machinegun" as defined, it would be returned to you as soon as our Branch has received either a FedEx (or alternate carrier) account number to which the return can be billed, or a prepaid return label.

We thank you for your inquiry and trust the foregoing has been responsive.

Sincerely yours,

  
Earl Griffith  
Chief, Firearms Technology Branch

AR000473





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

303826  
NOT m/kw

Martinsburg, WV 25405

www.atf.gov

907020:MRC  
3311/303826

SEP 14 2015

Ruble

Dear Mr. Ruble:

This refers to your recent correspondence and submission of a physical sample to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), Martinsburg, West Virginia. Specifically, you ask FTISB to evaluate your prototype design and determine its classification under Federal law.

The Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3), defines the term "firearm" as follows: "... (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon; (C) any firearm muffler or firearm silencer; or (D) any destructive device. Such term does not include an antique firearm."

Additionally, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines "machinegun" as—

"...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person."

You have submitted to FTISB a prototype 3D printed 10/22-style rifle stock. This is a follow-up design from a previous submission (907020:MRC 3311/302558) that FTISB classified as a machinegun.

Your submission consists of the following components:

AR000474

- 2 -

**Ruble**

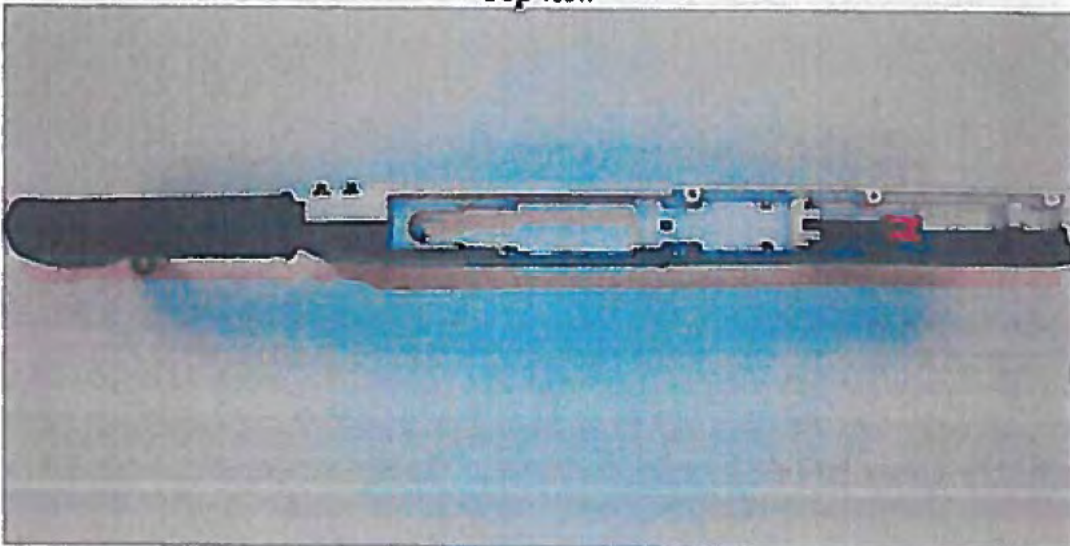
- Rifle stock/Gun support
- Pivot toggle
- Shuttle link
- Shuttle
- Forward actuator

You provided the prototype shown below:

**Side view**



**Top view**





- 3 -

Ruble

Assembled with Ruger 10/22 barreled action



Your prototype is designed in a manner that for firing requires the shooter (if right handed) to grip the forward pistol style grip with their left hand. The right hand will grip the rearward pistol grip requiring that the shooter place his/her trigger finger on the extension incorporated into the grip. The left forefinger will pull the forward actuator rearward causing the 10/22 barreled action to move forward until the Ruger 10/22 trigger contacts the shooters trigger finger and a projectile is expelled from the firearm barrel.

When a shot is fired, an intermediate amount of pressure is applied to the forward actuator with the left hand forefinger, and the barreled action via the shuttle recoils sufficiently rearward to allow the trigger to mechanically reset. Continued intermediate pressure applied to the forward actuator will then pull the receiver assembly forward until the trigger re-contacts the shooter's stationary firing-hand finger, allowing a subsequent shot to be fired. In this manner, the shooter pulls the firearm forward to fire each shot so that the action of firing is accomplished by a single trigger function. Further, each subsequent shot depends on the shooter applying the appropriate amount of forward pressure to the forward actuator and timing it to contact the trigger-finger on the firing hand.

As stated above, the NFA defines machinegun, in relevant part, as "any weapon which shoots...automatically more than one shot, without manual reloading, by a single function of the trigger." ATF has long held that a "single function of the trigger" is a single "pull" or a single "release" of the trigger. Therefore, a firearm that fires a single projectile upon a pull of the trigger and then fires another single projectile upon the release of that trigger would not be classified as a "machinegun" under Federal law.

AR000476

- 4 -

██████ Ruble

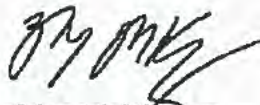
Since your device is incapable of initiating an automatic firing cycle that continues until either the finger is released or the ammunition supply is exhausted, FTISB finds that it is not a machinegun as defined under the NFA, 26 U.S.C. § 5845(b), or the Gun Control Act, 18 U.S.C. § 921(a)(23).

Please be advised that our findings are based on the item as submitted. Any changes to its design features or characteristics will void this classification. Further, we caution that the addition of an accelerator spring or any other non-manual source of energy which allows this device to operate automatically as described will result in the manufacture of a machinegun as defined in the NFA, § 5845(b).

To facilitate the return of your sample, please provide FTB with the appropriate FedEx or similar account information within 60 days of receipt of this letter. If their return is not necessary, please fax FTB at (304) 616-4300 with authorization to destroy them on your behalf.

We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request.

Sincerely yours,



Max M. Kingery

Acting Chief, Firearms Technology Industry Services Branch

AR000477



303826, SEPT 14, 2015 - Ruble, [REDACTED] - Bump Fire Stock - NOT A MACHINEGUN





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Firearms Technology Industry Services Branch*

Martinsburg, W.V.

www.atf.gov

APR 06 2017

304609  
NOT m/cum  
907010:CJT  
3311/304609

Wolff

Dear Mr. Wolff:

This refers to your correspondence, and sample AR15-type "Bump Fire Stock" to the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), in which you ask for a review of your sample device and if it would be regulated by the provisions of the Gun Control Act of 1968 (GCA) or the National Firearms Act (NFA).

As background to our evaluation, the amended Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3), defines the term "firearm" to include *any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and] ...the frame or receiver of any such weapon....*

Further, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines "machinegun" to mean—  
*...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.*

Your bump fire grip device consists of the following:

One AR-style pistol grip that is attached to and adjustable buttstock by a flat metal bar bent to contour to the buttstock. The pistol grip has two plastic pieces attached by small screws, one is the extension for resting your finger on while firing and the other is a shield to prevent the pistol grip from pinching the grip fingers of the firing hand.

AR000479



-2-

**Wolff**

Your stock is designed to allow an AR-type semiautomatic rifle mounted to it to reciprocate back and forth in a linear motion. The absence of an accelerator spring or similar component in the submitted device prevents it from operating automatically. When operated, forward pressure must be applied with the support hand to the forward handguard/fore-end of the AR-type rifle mounted to your stock, bringing the receiver assembly forward to a point where the trigger can be pulled by the firing hand. If sufficient forward pressure is not applied to the handguard with the support hand, the rifle can be fired in a conventional, semiautomatic manner since the reciprocation of the receiver assembly is eliminated.

The FTISB examination of the submitted device indicates that if as a shot is fired—and a sufficient amount of pressure is applied to the handguard/gripping surface with the shooter's support hand—the AR-type rifle assembly will come forward until the trigger re-contacts the shooter's stationary firing-hand trigger finger. Re-contacting allows the firing of a subsequent shot. In this manner, the shooter pulls the receiver assembly forward to fire each shot, each succeeding shot firing with a single trigger function.

Since your device does not initiate an automatic firing cycle by a single function of the trigger, **FTISB finds that it is NOT a machinegun** under the NFA, 26 U.S.C. § 5845(b), or the amended GCA, 18 U.S.C. § 921(a)(23).

We caution that our findings are based on the item as submitted. Any changes to its design features or characteristics will void this classification. Moreover, we should point out that the addition of an accelerator spring or any other non-manual source of energy which allows this device to operate automatically will result in the manufacture of a "machinegun" as defined in the NFA, 5845(b).



Submitted device

AR000480

-3-

Wolff



Your device will be returned to you via your provided UPS shipping label.

We thank you for your inquiry and trust the foregoing is responsive to your request.

Sincerely yours,

Michael R. Curtis

Chief, Firearms Technology Industry Services Branch

AR000481



304609 -- APR 6, 2017 -- Wolff, [REDACTED] / Bump Fire Stock -- NOT A MACHINEGUN







## U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives*Machine Gun*Washington, DC 20236  
www.atf.gov903050:MMK  
3311/2011-624[REDACTED] Savage  
Historic Arms, LLC  
[REDACTED]

NOV 23 2011

Dear Mr. Savage:

This refers to your correspondence to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco and Firearms (ATF), with an accompanying sample "ASFS Stock" and magazine, requesting an evaluation in accordance 18 U.S.C. 921(a)(3) and 26 U.S.C. 5845(a). As explained below, the evaluation of your submitted ASFS Stock (photo enclosed) finds that it is a combination of parts designed and intended to convert a firearm into a machinegun.

The examination conducted by FTB noted that the stock consisted of a large main outer shell, a rear shoulder pad, a right-side dust cover, two vertical grip assemblies, guide-rail mounting blocks, guide rails, and a retractable trigger cross-pin. The main shell and dust cover encase the firearm (a semiautomatic WASR-10 type) and guide-rail mounting blocks. The shell also incorporates an extension which covers the encased firearm's trigger and provides attachment for the retractable trigger cross-pin. The mounting blocks are attached to the interior of the main shell, and the guide rails are attached, connecting the encased firearm to the outer shell at both the rear and near the firearm's midpoint. One vertical grip is attached to the bottom of the main shell at the shell's forward end, and the other vertical grip is attached to the bottom of the forward end of the firearm's barrel. When assembled onto the firearm, the cross pin engages the enclosed WASR-10 trigger, and the forward vertical grip becomes the *trigger* used to initiate the firing sequence.

The firing sequence is initiated by the shooter pushing forward on the forward-most vertical grip while the shooter's other hand maintains control of the device by holding the rearmost vertical grip. The application of forward pressure forced the encased firearm to move forward against the cross pin; the weapon fired, the recoiling energy pushed the encased firearm rearward inside the stock, the trigger reset and the continuous forward pressure of the shooter drove the encased firearm back onto the cross pin so that the weapon again fired. The firing sequence continued until pressure was removed or the ammunition source was exhausted.

During the test firing, when a magazine of five rounds was inserted, the device fired all five rounds automatically without manual reloading by a single function of the trigger. Additionally, after loading a second magazine with two rounds, the device fired automatically when the device was simply tilted forward at an angle.

AR000483



-2-

**Savage**

against the cross pin and initiated the firing sequence, causing both rounds to be fired without manual reloading by a single function of the triggering mechanism.

A noted difference between this submission and your previously submitted ALM Stock, which was not classified as a "firearm," is the length of the area shrouding the trigger and the addition of a cross pin designed to engage an encased firearm's trigger. Thus configured, the ASFS Stock is designed to convert the recoiling forces generated from the action of an explosive to maintain a sequence of events which will continue automatically until the trigger is no longer activated or the ammunition is depleted.

As you know the National Firearms Act (NFA), 26 U.S.C. § 5845(a)(6), defines the term "firearm" to include *...a machinegun...*. Further, § 5845(b) defines a "machinegun" in part as: *...any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun....* Since the Historic Arms, ASFS stock was found to convert a semiautomatic firearm to fire automatically, more than one shot without manual reloading by the single function of the trigger, we determined the ASFS stock to be a "machinegun" as defined.

Because your sample is a "machinegun" as defined in the NFA and you are a licensed special occupational tax-payer, you have by close of business the next business day following receipt of this letter to register your device. As soon as FTB has received verification that the submitted ASFS stock is registered, we will return it to you. Since the device is not yet serialized, you must immediately upon its return apply the assigned serial number clearly and conspicuously and in accordance with the size and depth requirements found in 27 CFR 479.102. To preclude the susceptibility to obliteration, alteration, or removal, we recommend you apply the serial number markings to an externally visible portion of the largest single component of the device.

To facilitate return of your submission after registration is complete, please provide FTB with a prepaid shipping label from FedEx, UPS, or other such appropriate carrier.

As always, we remain available for future written inquiries concerning this or other matters.

Sincerely yours,

John R. Spencer  
Chief, Firearms Technology Branch

Enclosure

AR000484





m/gun.

75918

2011-624-mmK

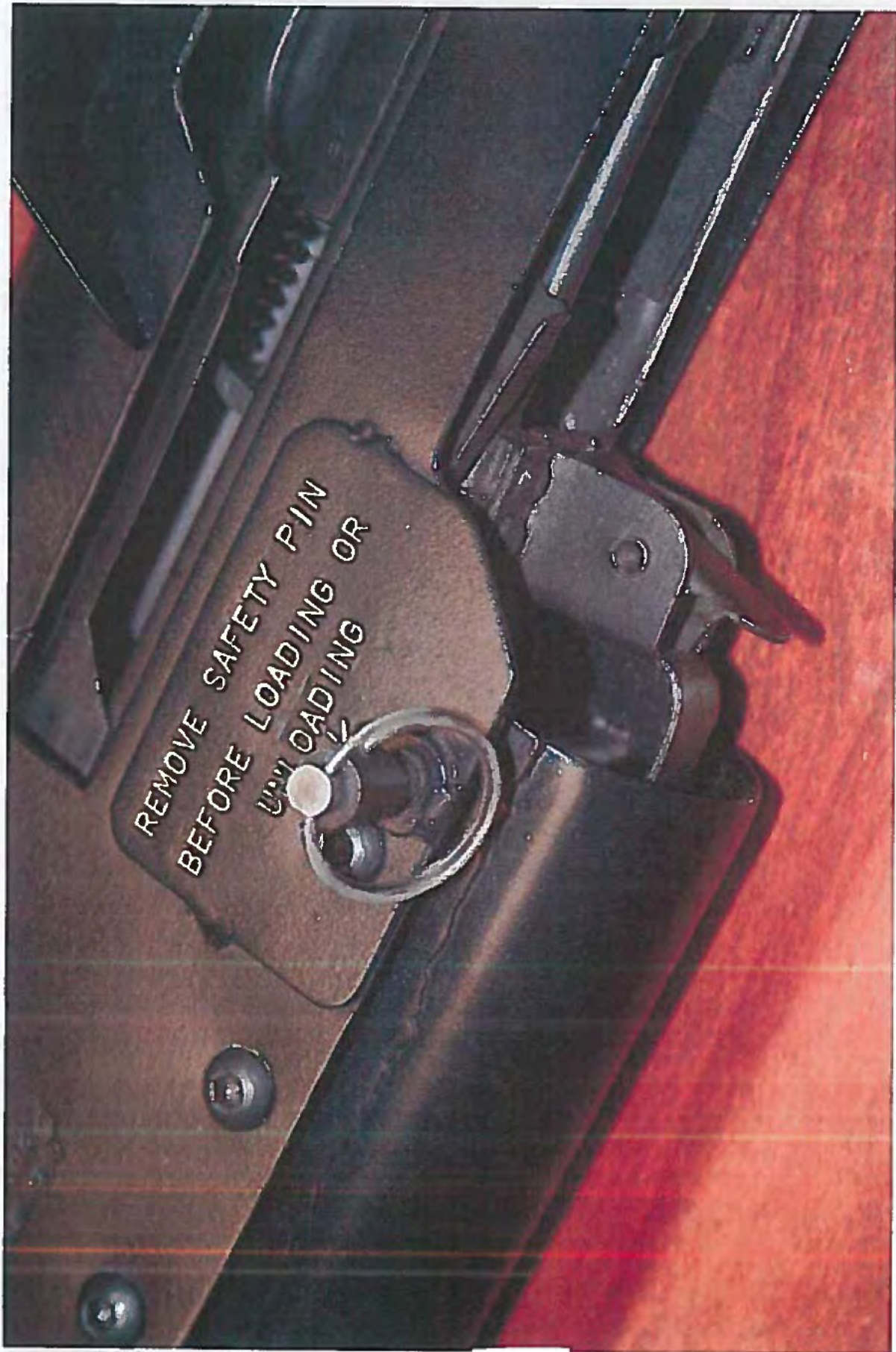
Savage, [REDACTED]





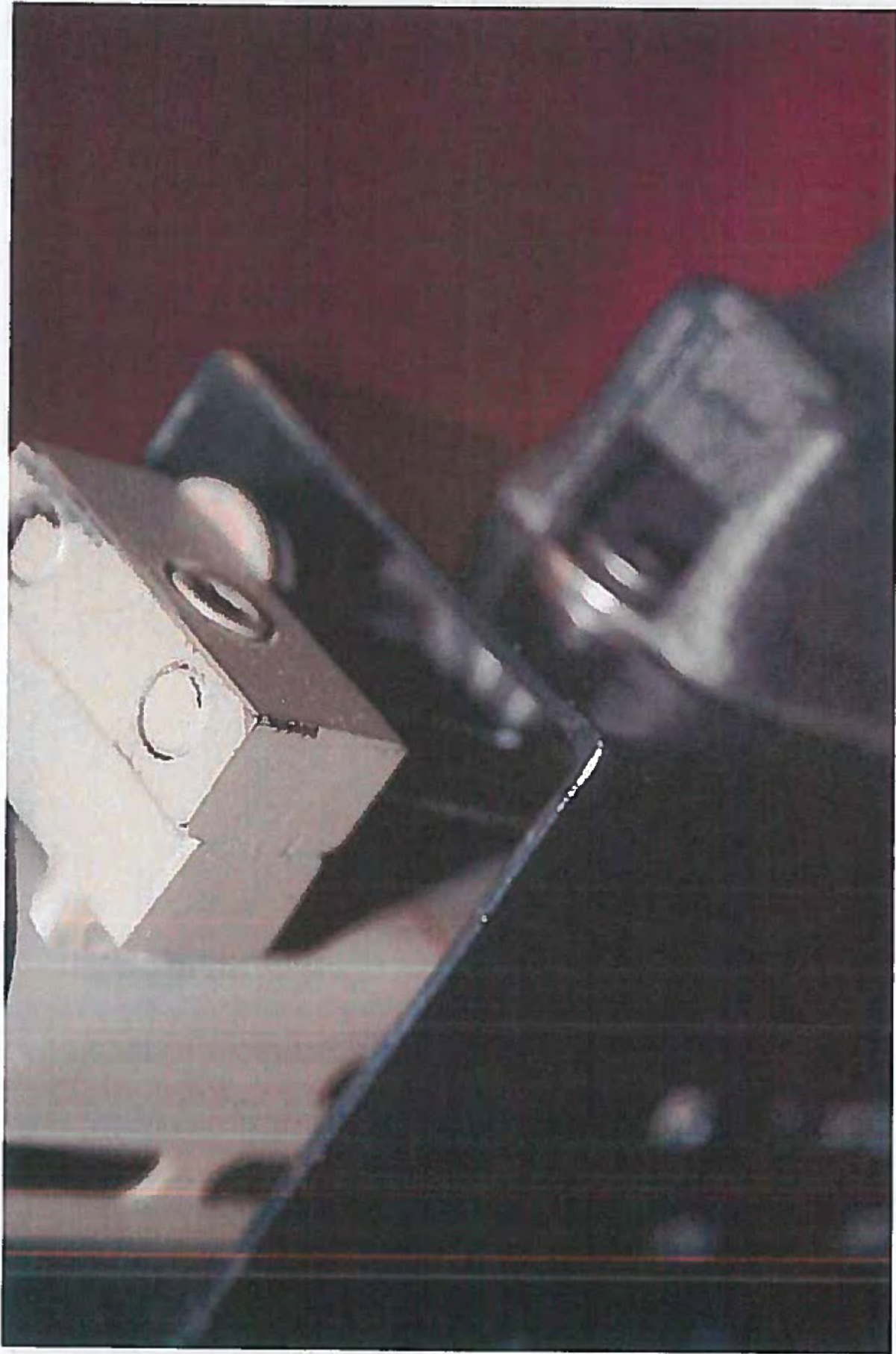
Savage 75918





Savage 75918





Savage 75918

**GOOD AFTERNOON/ I'M SPECIAL AGENT IN CHARGE JILL  
SNYDER/ OF ATF'S SAN FRANCISCO FIELD DIVISION// SPECIAL  
AGENTS FROM THE SAN FRANCISCO FIELD DIVISION'S/ LAS  
VEGAS FIELD OFFICE/ RESPONDED TO THE SHOOTING THAT  
OCCURRED ON SUNDAY//**

**ADDITIONAL AGENTS FROM OTHER LOCATIONS WITHIN THE  
SAN FRANCISCO FIELD DIVISION/ AS WELL AS/ AGENTS FROM  
ATF'S LOS ANGELES/ DALLAS/ PHOENIX AND BOSTON FIELD  
DIVISIONS HAVE BEEN WORKING ON THIS INVESTIGATION//**

**WE KNOW THAT YOU HAVE MANY QUESTIONS REGARDING  
THE FIREARMS IN THIS CASE// THERE HAS ALSO BEEN A LOT OF  
UNOFFICAL INFORMATION REPORTED REGARDING THE  
GUNS//**

**WE WOULD LIKE TO CLEAR UP ANY CONFLICTING  
INFORMATION REGARDING THE NUMBERS OF FIREARMS AND  
THE CURRENT STATUS OF TRACE INFORMATION//**



**PLEASE UNDERSTAND THAT THE INVESTIGATION IS ONGOING AND I WONT BE TAKING QUESTIONS AT THIS TIME BECAUSE WE ARE STILL WORKING THROUGH ALL OF OUR INVESTIGATIVE FINDINGS BUT I WILL GIVE YOU THE FACTS THAT WE HAVE AT THIS TIME//**

**CURRENTLY/ 47 FIREARMS HAVE BEEN RECOVERED AND A VERY LARGE AMOUNT OF AMMUNITION// THESE FIREARMS WERE RECOVERED FROM THREE DIFFERENT LOCATIONS: THE HOTEL ROOM, THE HOUSE IN MESQUITE, and THE HOUSE IN VERDI//**

**THE RECOVERED FIREARMS INCLUDED RIFLES, SHOTGUNS AND PISTOLS WHICH WERE PURCHASED BY THE GUNMAN IN NEVADA/ UTAH/ CALIFORNIA AND TEXAS**

**AT THIS TIME/ NONE OF THE GUNS RECOVERED APPEAR TO BE HOMEMADE//**

**12 “BUMP FIRE”-TYPE STOCKS WERE ALSO FOUND ON  
FIREARMS RECOVERED FROM THE HOTEL ROOM//**

**FIREARMS ACCESSORIES, LIKE BUMP STOCK DEVICES, ARE  
GENERALLY UNREGULATED UNDER FEDERAL LAW. THEY  
ARE SUBJECT TO FEDERAL REGULATION ONLY IF THEY FALL  
WITHIN A SPECIFIC PROVISION OF THE NATIONAL FIREARMS  
ACT OR GUN CONTROL ACT.**

**THE ATF FIREARMS AND AMMUNITION TECHNOLOGY  
DIVISION REVIEWS DEVICES SUCH AS BUMP FIRE STOCKS TO  
DETERMINE WHETHER THEY SHOULD BE CLASSIFIED AS  
FIREARMS SUBJECT TO THE PROVISIONS OF THE NFA AND GCA --  
INCLUDING PROVISIONS WHICH STRICTLY LIMIT THE  
MANUFACTURE AND POSSESSION OF FULLY AUTOMATIC  
WEAPONS//**



THE CLASSIFICATION OF THESE DEVICES DEPENDS ON WHETHER  
THEY MECHANICALLY ALTER THE FUNCTION OF **THE FIREARM**  
**TO FIRE AUTOMATICALLY//**

I CANNOT FURTHER COMMENT ON THE BUMP-FIRE TYPE  
DEVICES RECOVERED IN THIS CASE AT THIS TIME AS THE  
PROCESSING AND ASSESSMENT OF EVIDENCE ONGOING,  
INCLUDING WHETHER OR HOW THE **FIREARMS WITH BUMP-**  
**STOCKS WERE USED//**

**WE ARE STILL IN THE PROCESS OF COMPILING ALL OF THE**  
**TRACE DATA//**

**AS THE INVESTIGATION PROCEEDS ATF WILL CONTINUE TO**  
**CONDUCT INTERVIEWS AND PROVIDE OUR RESOURCES AND**  
**FULL SUPPORT TO SHERIFF AND LOCAL LAW ENFORCEMENT//**

**THANK YOU//**